

REMARKS

Claims 1-23 are pending in the application, as amended. Claim 1 has been amended to further define the media turnover guide by claiming that a curved surface “turns the printed media over” and the printed media is output to “an external surface of” the top cover of the main body. The amendment to claim 1 is supported by the specification at least at the second full paragraph of page 5. Claims 2, 5–8 and 13 have been amended by rewriting the claims into independent form as instructed, making the claims allowable. Claim 14 has been added and is supported by the specification at least at the paragraph bridging pages 3 and 4. Claim 15 has been added and is supported by the specification at least at the second full paragraph of page 5. Claims 16, 17, 19, 20 and 22 have been added and are supported by the specification at least at paragraph 4 of page 9. Claims 18 and 21 have been added and are supported by the specification at least at the paragraph bridging pages 9 and 10. Claim 23 has been added and is supported at least at the first paragraph of page 9. No new matter has been added to the application by the amendment.

Rejection - 35 U.S.C. § 102

The Examiner rejected claim 1 under 35 U.S.C. § 102 as being unpatentable over Underwood *et al.* The Examiner states that Underwood *et al.* teaches a printer comprising a main body having a front, a back, a top cover, a back delivery unit mounted on the back of the main body for receiving print media face-up and a media turnover guide having a curved surface that guides the print media face-down onto the top cover of the main body. Applicant respectfully traverses this rejection.

The present application is directed to a printer that includes a main body 50 with a front 50a and a back 50b. A top cover 15 covers the top portion of the main body 50 and a media turnover guide 16 is attached above the back edge of the top cover 15 by pins 17 so that the media turnover guide 16 can move from a first position (in phantom in Fig. 3) to a second position (in solid lines in Fig. 3). The printer further includes a back delivery unit that extends from a delivery ledge 55 to a media rack 51. In another embodiment, shown in Fig. 12, the top

cover 75 has a hump 75a extending longitudinally in the direction in which the printed media are delivered. The hump 75a is used to flatten out transversely curled media output by forcing the media to curl in a direction orthogonal to the transverse direction (see the first full paragraph of page 10). In operation, blank paper is stacked inside of the media rack 51. When a printing cycle is initiated, paper is fed from the media rack 51 through the inlet in a direction indicated by the arrow A (Fig. 2). The sheet is further fed around the feed roller 52 in the direction indicated by the arrow B. Images are printed on the top side of the blank sheet by various instruments 84, 87 and further fed by rollers 83, 88, 12 in a direction indicated by the arrow C. When the media turnover guide 16 is in the second position (solid lines in Fig. 3), the printed paper is output face-up from the main body 50 onto the top surface of the media rack 51. When the media turnover guide 16 is in the first position (Fig. 2), the printed paper makes contact with the back wall 16b and roof 16a of the media turnover guide 16 as the printed paper exits the main body 50. The curved surface of the media turnover guide 16 turns the print media over and guides the printed media face-down onto an external surface of the top cover 15 of the main body 50. Thus, the media turnover guide 16 allows for printed media to stack face-down on the surface of the top cover 15, eliminating the necessity of reordering the output media by a user.

Underwood *et al.* is directed to a printer 10 that includes an input tray 12 which holds a stack of print media, a print engine 14 that performs the printing function by printing on a top side of the media, a diverter mechanism 26 provided to direct the media sheet exiting the print engine to an appropriate path portion, and two outputs 18, 20. The first output 18 is at a distal end of a media path through the print engine 14 and holds the output in a face-up orientation. The second output 20 is a face-down output and is a tray extending out of the top surface of the printer 10 (Fig. 2). In another embodiment shown in Fig. 5, the second output 122 is located within the printer 100 under the top surface of the printer 100. For a face-up output, the diverter mechanism 26 is in a position as shown in Fig. 4D so that the printed media can exit the printer 10 face-up onto the first output 18. For a face-down output, the diverter mechanism 26 is positioned as shown in Fig. 4B so that the printed media exits the printer 10 face-down onto the second output 20. Thus, the position of the diverter mechanism 26 determines whether the printed media is output face-up or face-down.

Claim 1, as amended, recites, *inter alia*,

a media turnover guide having a curved surface that turns the printed media over and guides the printed media face-down onto an external surface of the top cover of the main body.

The above-underlined language distinguishes claim 1 over Underwood *et al.* Applicant's face-down output is the actual surface of the top cover of the main body. This novel feature is not disclosed, suggested or taught by Underwood *et al.* In Underwood *et al.*, the face-down output is not the actual external surface of the top cover of the main body of the printer. The top of the printer 10 is shown in phantom (Fig. 2). In one embodiment the face-down output 20 is a tray that extends from the top surface of the printer. In another embodiment, the face-down output 122 is underneath the top surface of the printer 100. For the face-down output to be the actual top surface of the main body, the printed media would have to exit and rest on top of the phantom line representing the top surface. There is no such teaching or disclosure in any of the drawings nor in the specification. Thus, the face-down outputs in Underwood *et al.* are trays rather than the actual surface of the printer.

Thus, Underwood *et al.* does not disclose each and every feature of claim 1, and claim 1 distinguishes over Underwood *et al.* because Underwood *et al.* does not show, teach or suggest a face-down output that is an actual external surface of the top cover of the main body. Reconsideration and withdrawal of the rejection are respectfully requested. The Examiner has also rejected claims 1 and 12 under 35 U.S.C. § 102 as being unpatentable over Nunes *et al.* The Examiner states that Nunes *et al.* teaches a printer comprising a main body having a front, a back, a top cover, a back delivery unit mounted on the back of the main body for receiving printed media face-up and a media turnover guide having a curved surface that guides the printed media face-down onto the top cover of the main body. Furthermore, the Examiner states that the top cover of the main body has a hump extending longitudinally in a direction in which the printed media are delivered from the media turnover guide. Applicant respectfully traverses this rejection.

Nunes *et al.* discloses a multifunction printer with a print engine 20 enclosed within the printer. Copy sheets to be printed are fed from a copy paper supply (cassette) 23 or an alternate input 24 to the print engine 20. Once fed through the print engine 20, a paper path decision gate 28 guides the printed paper to a side output sheet stacking tray 29 for face-up output or a top output tray 55 located on top of a module 50 and on top of the entire printer 10 for face-down output (column 5, lines 39-42).

With respect to claim 1, in Nunes *et al.*, the face-down output tray 55 is on top of the module 50 and the entire printer 10 as stated in column 5, lines 39-42. Further, the output stacking tray 55 is said to be a tray not only in the Abstract but also throughout the specification. Thus, the face-down output in Nunes *et al.* is not located on the external surface of the top cover of the main body but is located on a tray extending from the printer as shown and described in the drawings and specification of Nunes *et al.*

Thus, Nunes *et al.* does not disclose each and every feature of claim 1, and claim 1 distinguishes over Nunes *et al.* because Nunes *et al.* does not show, teach or suggest a face-down output that is an actual external surface of the top cover of the main body. Reconsideration and withdrawal of the rejection are respectfully requested. It is submitted that independent claim 1 is now allowable together with all the remaining claims which depend directly or indirectly therefrom.

Claim 12, in its present and original form, recites:

The printer of Claim 1, wherein the top cover of the main body has a hump extending longitudinally in a direction in which the printed media are delivered from the media turnover guide.

The above underlined language distinguishes claim 12 over Nunes *et al.* Applicant's hump 75a of the top cover 75 forces the media to curl in a direction orthogonal to the transversal direction so that the transversal curl formed while the media is output from the exit opening is flattened out. This novel feature is not disclosed, suggested or taught by Nunes *et al.* There is nothing in the specification or drawings of Nunes *et al.* that shows a hump extending on

the top cover of the printer so that the printed media are flattened out. Accordingly, Nunes *et al.* does not disclose each and every feature of claim 12, and claim 12 distinguishes over Nunes *et al.* because Nunes *et al.* does not show, teach or suggest a hump on the top cover of the printer capable of flattening out the printed media.

Reconsideration and withdrawal of the rejection are respectfully requested. It is submitted that claim 12 is now allowable. It is noted that the Examiner has objected to claims 2-11 and 13 as being dependent on a rejected base claim, but would be allowable if written in independent form. Claims 2, 5-8 and 13 have been rewritten in independent form. It is submitted that these claims are now allowable, together with all of the remaining claims which depend directly or indirectly therefrom.

CONCLUSION

In view of the above Amendment and Remarks, it is respectfully submitted that the present application, including claims 1-23, is in condition for allowance.

Respectfully submitted,

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